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BY: /s/ Francis J. Ballak
FRANCIS J. BALLAK (FJB2746)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

IN RE: : CHAPTER 11
: :
ADAMAR OF NJ IN LIQUIDATION, :
LLC : CASE NO. 09-20711
: :
: :
Debtors : JUDGE: JUDITH H. WIZMUR

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

TO: See attached list.

PLEASE TAKE NOTICE that on **Monday, May 18, 2011 at 9:30 a.m.** in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorneys for the creditor, John Crabtree shall move before the United States Bankruptcy Court, at the Court House, Camden, New Jersey for an Order granting relief from the automatic stay to grant John Crabtree relief from the automatic stay to institute and prosecute to conclusion personal injury litigation in state court.

Movant shall rely upon the enclosed Statement of Counsel and the enclosed letter brief.

Movant requests oral argument in accordance with the local rules.

**GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL**
Attorneys for John Crabtree

/s/ Francis J. Ballak, Esquire
FRANCIS J. BALLAK, ESQUIRE

DATED: April 27, 2011

SERVICE LIST

Adamar of NJ in Liquidation, LLC f/k/a
Adamar of New Jersey, Inc. and Manchester Mall, Inc.
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Debtor

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